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Attorneys for Plaintiffs (Co-counsel information on next page)

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 KOLETTE A. PAGE and CLETUS M.
12 PAGE, individually and on behalf of
13 their individual retirement accounts,

Plaintiffs,

14 v.

15 MINNESOTA LIFE INSURANCE
16 COMPANY, a Minnesota corporation;
17 SHURWEST HOLDING COMPANY,
18 INC., an Arizona corporation;
19 SHURWEST, LLC, an Arizona limited
20 liability company; HAPPY STATE
21 BANK & TRUST COMPANY dba
22 GOLDSTAR TRUST COMPANY, a
23 Texas business entity (corporate status
24 unknown); FUTURE INCOME
25 PAYMENTS, LLC, a Delaware limited
26 liability company; CMAM, INC. dba
27 HERITAGE FINANCIAL SERVICES, a
28 California corporation; ALBERT
ANDREW MANFRE, an individual;
JEANETTE MANFRE, an individual;
MATTHEW LEE BIESER, an
individual; and DOES 1-10, inclusive,

Defendants.

Case No. 8:18-cv-01208-AG-KES
[Hon. Andrew J. Guilford]

**PLAINTIFFS' REQUEST TO
ENTER DEFAULT OF
DEFENDANT FUTURE INCOME
PAYMENTS, LLC**

Action Filed: July 9, 2018
Trial Date: None

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Attorneys for Plaintiffs

1 **TO THE CLERK OF THE ABOVE-ENTITLED COURT**

2 Plaintiffs hereby request that the Clerk of the above-entitled Court enter default
3 in this matter against defendant Future Income Payments, LLC (“FIP”) on the ground
4 that FIP has failed to appear or otherwise respond to the complaint within the time
5 prescribed by the Federal Rules of Civil Procedure.

6 On August 10, 2018, Plaintiffs personally served FIP’s agent for service of
7 process. FIP was required to respond to Plaintiffs’ complaint within 21 days of the
8 August 10, 2018 service—by August 31, 2018. FIP did not respond by August 31,
9 2018 and, to date, has not responded.

10 The above stated facts are set forth in the accompanying declaration of Ohia
11 A. Amadi, filed herewith.

12
13 **REIF LAW GROUP, P.C.**

14 Dated: September 18, 2018 By: Ohia Amadi

15 Brandon S. Reif

16 Marc S. Ehrlich

17 Ohia A. Amadi

18 Jon C. Furgison

19 **FURGISON LAW GROUP, P.C.**

20 *Attorneys for Plaintiffs*
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